

and that both Lots 84 and 85 do abut on North Alley and are part of the said town, and further neither admit nor deny that the said Lots are in a subdivision known as "Dorsey's Partnership" since they have no knowledge regarding what area of the said Town was in "Dorsey's Partnership" and what area in "Hunting Loll".

THIRD: That your Respondents admit the allegations contained in Paragraph 3 of said Bill of Complaint except for the reference to the boundaries of the subdivision (known as "Dorsey's Partnership") being located in said town which they deny based on the Plat and Plan of the Town as laid out by Nicholas Hall and recorded on the first day of June, 1793 which states that it is "part of a Tract of Land called 'Dorsey's Partnership....'".

FOURTH: That your Respondents admit the allegations contained in Paragraph 4 of said Bill of Complaint.

FIFTH: That your Respondents admit the allegations contained in Paragraph 5 of said Bill of Complaint except as follows:

A. That your Respondents deny that the Plat and Plan of the Town and lots of New Market referred to in subparagraph A of said Paragraph 5 is dated June 1, 1793, averring that it was recorded on said date, but that it was dated the 29th day of January 1793, and further that the Plat and Plan of the Town and lots of New Market referred to as aforesaid and attached to said Bill of Complaint does not purport to be a Deed of Trust except in the notation made by the Clerk recording the instrument.

B. That the Last Will and Testament referred to in subparagraph B of said Paragraph 5 and attached to said Bill of Complaint only purports to be that of Elizabeth Pitts, not Elizabeth Hall Pitts and that your Respondents do not know whether or not she was a daughter and heir of Nicholas Hall and therefore neither admit nor deny said allegation.

C. That the Deed referred to in subparagraph C of the said Paragraph 5 of said Bill of Complaint is not a deed from Nicholas Hall Pitts, Executor, to Christian Harding, conveying Lots 83 and 84 on said Plat and is not recorded